

### **In the Drawings**

Applicant is amending FIG. 1 by adding a box "10" surrounding the components of FIG. 1

## Remarks

In paragraph 3 the Examiner objected to claim 5 because it is labeled as claim 6. In response Applicant is amending claim 5 as required, and respectfully requests withdrawal of the objection.

In paragraph 4 the Examiner rejected claims 1-12 under 35 U.S.C. §112, first paragraph, on the ground that "Claim 1 is directed to a single apparatus that comprises a messaging client, an automated agent and a backend system. Applicant's specification does not support the claimed composition of the various components into a single apparatus."

In response Applicant is amending FIG. 1 by adding a box "10" surrounding the components of FIG. 1, and correspondingly amending the Specification on page 5 line 19 to insert the words In an apparatus 10. This does not constitute entry of new matter. As the rejection stated, "Claim 1 is directed to a single apparatus that comprises a messaging client, an automated agent and a backend system." MPEP 608.01(I) allows "In establishing a disclosure, applicant may rely not only on the description and drawing as filed but also on the original claims if their content justifies it." Accordingly Applicant respectfully submits that the Specification as-amended supports claim 1 to a single apparatus comprising components of amended FIG. 1, and requests withdrawal of the rejection.

Applicant is also amending the Specification on page 5 line 24 to replace the word "protocol" with network 130 as illustrated in messaging system 140 of FIG. 1 as-filed. Applicant is amending the Specification on page 7 line 2 to delete the superfluous word "maintaining." Applicant is amending the Specification on page 8 line 2 to insert a space in "server\_160." Applicant is amending the Specification on page 9 lines 5-8 to resolve inconsistent wording. Applicant is amending the Specification on page 9 line 25 through page 10 line 1 to reconcile the notations for input and output in the examples on pages 10 and 11. No new matter is introduced.

In paragraph 6 the Examiner rejected claims 1-5, 7-17 and 19-24 under 35 U.S.C. §102(e) as being anticipated by Lagarde et al, U.S. Patent Publication No. 2003/0093480 ["Lagarde"].

In paragraph 7 the Examiner stated that "As to claim 1, Lagarde discloses an apparatus for manipulating data in a backend system using an automated agent [Figure 1, <<item: 106>>], said apparatus comprising:

...

wherein said backend system is coupled to said automated agent [Figure 1, <<items 106, 118, 110>> where : Lagarde's bot is coupled to the third party system 110 through network 118 | 0046>>].

In response Applicant is amending independent claims 1 and 13 to recite "manipulating and updating data" in a backend system, and to incorporate limitations from canceled claims 2, 3 and 14, 15. New independent claim 25 also recites entering "updating data," with the limitations that the messages are instant messages and the backend system is a calendar server system. These amendments are supported on page 5 in line 15, on page 9 in lines 9-10 and lines 20-22, and on page 11 in line 17 in the application as-filed. As the rejection might be applied to amended claims 1 and 13, and new claim 25, Applicant respectfully traverses.

Lagarde does not update data in a backend system. Lagarde's "manipulating" of data would more accurately be described as "accessing and retrieving." Lagarde's botservers 106-116 format and route instant messages (paragraphs 12, 42, 50, 74) to third party applications which "are any database system supporting the storage and retrieval of records... such as personal finance databases, stock market databases or personal contact databases" (paragraph 46; see also the first sentences of paragraphs 52 and 58). Once the message is delivered to the third party application, information may be accessed and retrieved.

In the event that the message included an information request, a return message is received from the third party application. The return message includes the requested information. The destination of the return message is determined. The client messaging application determined to be the

destination of the return message is then selected and the return message is transmitted to the client messaging application. (paragraph 9).

But Lagarde has not taught "updating data" in his third party database application or backend system. On the contrary, Lagarde teaches away from more complex interactions (such as updating data) in a backend system. In his Background section Lagarde objects to the prior art:

Web browsers are many times slow and time-consuming to use. ... Further, web browsers often require *a certain amount of user interaction* in order to access information. Users must often navigate through a series of web pages in order to get the information they are seeking. This can be time-consuming and annoying. (paragraph 6, emphasis added)

and in his Summary section Lagarde appeals that:

...the present invention allows a user to access desired information quickly, efficiently, and using a *minimal* amount of user interaction. (paragraph 11, emphasis added)

#### **Conclusion**

Lagarde does not teach updating data in a backend server system, much less a calendar server, and therefore does not anticipate the independent claims 1, 13 and 25. Applicant respectfully requests that the Examiner withdraw the rejection and allow all of claims, 1, 13 and 25.

Claims 4-8, 11 and 12 depend from claim 1, and claims 16-20, 23 and-24 depend from claim 13, and are therefore allowable for at least the same reasons as independent claims 1 and 13. Applicant requests that the Examiner withdraw the rejection, and allow all, of the pending dependent claims.

Should the Examiner find it helpful, he or she is encouraged to contact the Applicant's attorney Michael A. Glenn at (650) 474-8400.

Respectfully submitted,



Michael A. Glenn  
Reg. No. 30,176

Customer No. 22,862